

SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, P.C.
 By: Stuart A. Tucker, Esq., NJAID# 047561991
 A Professional Corporation
 Quakerbridge Executive Center
 101 Grovers Mill Road, Suite 200
 Lawrenceville, New Jersey 08648
 (609) 275-0400, Facsimile (609) 275-4511
 Attorneys for Plaintiff, Ronald Godbolt

RONALD GODBOLT,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION - MERCER COUNTY
Plaintiff,	:	
	:	DOCKET NO: MER-L-1675-20
vs.	:	
	:	Civil Action
CARLOS L. SANTANA, UNITED	:	
STATES POSTAL SERVICE, et al,	:	SUMMONS
	:	
Defendants.	:	

THE STATE OF NEW JERSEY TO THE ABOVE NAMED DEFENDANT(S) :

CARLOS L. SANTANA

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. A \$175.00 filing fee payable to the Treasurer, State of New Jersey, and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to

plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and cost of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Service office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated: September 23, 2020

S/ MICHELLE M. SMITH
MICHELLE M. SMITH, CLERK, SUP.CT.

Name of Defendant to be served: **Carlos L. Santana**

Address for Service: **12 Vernetta Lane**
Medford, NJ 08055

LAWYER REFERRAL SERVICES

LAWYER REFERRAL SERVICES

Atlantic County Bar Association
 Lawyer Referral Service
 Atlantic County Civil Courts Bldg., 1201 Bacharach Blvd.,
 Atlantic City 08401
 (609) 345-3444
 Internet: www.atcobar.org
 Exec. Dir.: Tamara M. Lamb
 Email: tamara.lamb@atcobar.org

Bergen County Bar Association
 Lawyer Referral Service
 15 Bergen St., Hackensack 07601 (201) 488-0044
 Administrator: Lucy Vargues

Burlington County Bar Association
 Lawyer Referral Service
 137 High St., 3rd Floor, Mount Holly 08060
 (609) 261-4862; Fax: (609) 261-5423
 Internet: www.burlcobar.org
 Exec. Dir.: Kara E. Edans (609) 261-4542

Camden County Bar Association
 Lawyer Referral Service
 1040 Kings Hwy. N., Suite 201, Cherry Hill 08034
 (856) 482-0618; Fax: (856) 482-0637
 Internet: www.camdencountybar.org
 Manager: Denise K. Whybark

Cape May County Bar Association
 Lawyer Referral Service
 Rt. 9, Main St., P.O. Box 425,
 Cape May Court House 08210
 (609) 463-0313; Fax: (609) 463-1656
 Email: cmcba@comcast.net
 Internet: www.cmcba.org
 Exec. Dir.: Michele Devine-Hartnett

Cumberland County Bar Association
 Lawyer Referral Service
 P.O. Box 2374, Vineland 08362
 (856) 696-5550; Fax: (856) 696-5558
 Internet: cnjbar.org
 Exec. Dir.: Lou Ann Ferrari-Brooks

Essex County Bar Association
 Lawyer Referral Service
 Essex County Historic Othse., Room B01,
 470 Dr. Martin Luther King, Jr. Blvd., Newark 07102
 (973) 622-6204; Fax: (973) 622-4341
 Internet: www.essexbar.com
 Administrator: Kathy Ofray (973) 622-6207, Ext. 10

Gloucester County Bar Association
 Lawyer Referral Service
 P.O. Box 338, Woodbury 08096
 (856) 848-4589; Fax: (856) 384-9580
 Internet: www.gcbanj.org
 Exec. Dir.: Lynn A. Silverstein (856) 848-4071

Hudson County Bar Association
 Lawyer Referral Service
 583 Newark Ave., 4th Floor, Jersey City 07306
 (201) 798-2727; Fax: (201) 798-1740
 Email: staff@hcbalaw.com
 Internet: www.hcbalaw.com
 Exec. Dir.: Lisa Burke (201) 798-4708

Hunterdon County Bar Association
 Lawyer Referral Service
 P.O. Box 573, Annandale 08801
 (908) 200-7822; Fax: (908) 200-7159
 Email: hcbalaw@comcast.net
 Internet: www.huntcolaw.org
 Director: Jenny Plassche
 Email: director@huntcolaw.org

Mercer County Bar Association
 Lawyer Referral Service
 1245 Whitehorse Mercerville Rd., Suite 420,
 Hamilton 08619-3894
 (609) 585-6200; Fax: (609) 585-5537
 Internet: www.mercerbar.com
 Director: Christine S. Brennan
 Email: cbrennan@mercerbar.com

Middlesex County Bar Association
 Lawyer Referral Service
 87 Bayard St., New Brunswick 08901
 (732) 828-0053
 Internet: www.mcbalaw.com
 Exec. Dir.: Jonathan P. Cowles
 Email: jcowles@mcbalaw.com
 Administrator: Pattyann Pulda
 Email: ppulda@mcbalaw.com

Monmouth Bar Association
 The Lawyer Referral Service
 Courthouse, Freehold 07728
 (732) 431-5544; Fax: (732) 431-2843
 Exec. Dir.: Tracey A. Settignano

Morris County Bar Association
 Lawyer Referral Service (Morris & Sussex Counties)
 245 South St., Unit 1, Morristown 07960
 (973) 267-6089; Fax: (973) 605-8325
 Coordinator: Yorelis Perez (973) 267-5582
 Email: yperez@morriscountybar.com

Ocean County Bar Association
 Lawyer Referral Service
 Courthouse, P.O. Box 381, Toms River 08753
 (732) 240-3666; Fax: (732) 240-4907
 Email: ocba@verizon.net
 Director: Karin Poola

Passaic County Bar Association
 Lawyer Referral Service
 Courthouse, 3rd Floor, 401 Grand St., Paterson 07505
 (973) 278-9223
 Secretary: Dianne Grosso

Salem County Bar Association
 Lawyer Referral Service
 (856) 935-5629
 Internet: www.salemcountybar.org/attorney_directory/

Somerset County Bar Association
 Lawyer Referral Service
 325 Historic Courthouse, 3rd Floor, 20 N. Bridge St.,
 P.O. Box 1095, Somerville 08876-1095
 (908) 685-2323; Fax: (908) 685-9839
 Internet: www.somersetbar.com
 Exec. Dir.: Carol Ann Winder
 Email: cawinder@somersetbar.com

Union County Bar Association
 Lawyer Referral Service
 Courthouse, 1st Floor, Elizabeth 07207
 (908) 353-4715; Fax: (908) 354-8222
 Exec. Dir.: Jeffrey M. Clar
 Administrator: Tracy Foster
 Hours: Mon.-Thurs, 10 A.M.-1 P.M.

Warren County Bar Association
 Lawyer Referral Service
 413 Second St., Belvidere 07823
 (908) 387-1835
 Email: info@warrencountybar.org
 Exec. Dir.: Appointment Pending

LEGAL AID AND LEGAL SERVICES

LEGAL AID AND LEGAL SERVICES

STATEWIDE

American Civil Liberties Union of N.J. (ACLU-NJ)
P.O. Box 32159, Newark 07102
(973) 642-2084; Fax: (973) 642-6253
Email: intake@aclu-nj.org
Internet: www.aclu-nj.org
Exec. Dir.: Udi Ofer
Legal Dir.: Edward Barocas

Community Health Law Project
Administrative Office
185 Valley St., South Orange 07079
(973) 275-1175; Fax: (973) 275-5210; TTY: (973) 275-1721
Email: chlpinfo@chlp.org
Internet: www.chlp.org
President/Exec. Dir.: Harold Garwin

Disability Rights New Jersey (DRNJ)
210 S. Broad St., 3rd Floor, Trenton 08608
(609) 292-9742; Toll-free (in-state only): (800) 922-7233;
TTY: (609) 633-7106; Fax: (609) 777-0187
Email: advocate@drnj.org
Internet: www.drnj.org
Exec. Dir.: Joseph B. Young
Legal Dir.: Susan Saidel

Legal Advocacy for People with Disabilities
Formerly New Jersey Protection and Advocacy, Inc.

Education Law Center
60 Park Pl., Suite 300, Newark 07102
(973) 624-1815; TTY: (973) 624-4618; Fax: (973) 624-7339
Email: elc@edlawcenter.org
Internet: www.edlawcenter.org
Exec. Dir.: David Sciarra; Email: dsciarra@edlawcenter.org
Managing Dir.: Theresa Luhm
Email: truhm@edlawcenter.org
Senior Atty.: Elizabeth Athos
Email: eathos@edlawcenter.org
Atty.: Jessica Levin; Email: jlevin@edlawcenter.org
Dir. of Secondary Reform: Stan Karp
Email: skarp@edlawcenter.org
Dir. of Education Justice: Molly A. Hunter
Email: mhunter@edlawcenter.org
Policy & Outreach Dir.: Sharon Krengel
Email: skrengel@edlawcenter.org
Intake Coordinator: Aimee Roche
Email: aroche@edlawcenter.org
Research Dir.: Danielle Farrie
Email: dfarrie@edlawcenter.org
Receptionist: Diane Gayoso; Email: dgayoso@edlawcenter.org
Education matters

Legal Center for Defense of Life, Inc.
14 Franklin St., Morristown 07960 (973) 984-0725
Email: help@legalcenternj.org
Litigation involving Pro Life Related Issues.

Legal Services of New Jersey, Inc.
100 Metroplex Dr. at Plainfield Ave., Suite 402,
P.O. Box 1357, Edison 08818-1357
(732) 572-9100; Fax: (732) 572-0066
Email: lsny@lsnj.org
Internet: www.lsnj.org
President and General Counsel: Melville D. Miller, Jr.
Exec. V.P. and Asst. General Counsel: Dawn K. Miller
Sr. V.P.: Claudine M. Langrin

N.J. Department of the Treasury
State Office of Legal Services
Special Administrative Services, 50 W. State St.,
P.O. Box 211, Trenton 08625-0211
(609) 292-6262
Director: Rafael V. Aviles

National Legal Aid & Defender Assn. (NLADA)
Washington Office
1901 Pennsylvania Ave., Suite 500, Washington, DC 20036
(202) 452-0620; Fax: (202) 872-1031
Email: info@nlada.org
Internet: www.nlada.org
President/C.E.O.: Jo-Ann Wallace
Email: j.wallace@nlada.org
Civil and Defender Law

New Jersey Protection and Advocacy, Inc.
See Disability Rights New Jersey (DRNJ)

Pro Bono Partnership
300 Lanidex Plz., Suite 3203, Parsippany 07054
(973) 240-6955; Fax: (973) 240-6966
Internet: www.probonopartnership.org

Dir., N.J. Program: Nancy Eberhardt
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Senior Staff Attys.:
Christine Michelle Duffy; Email: cduffy@probonopartner.org
Kent Hansen; Email: khansen@probonopartner.org
A resource center that matches volunteer attorneys with
nonprofit organizations requesting legal assistance.
Also serves New York and Connecticut

ATLANTIC COUNTY

Community Health Law Project Atlantic, Camden,
Cape May, Cumberland, Gloucester & Salem Counties
See Camden County

South Jersey Legal Services Inc.
1300 Atlantic Ave., Mezzanine Floor, Atlantic City 08401
(609) 348-4200, Ext. 6350; Fax: (609) 345-6919
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Email: cstabbert@lsnj.org

Poverty Law

BERGEN COUNTY

Bergen County Community Mental Health Law Project
One Bergen County Plz., 4th Floor, Hackensack 07601
(201) 634-2762; Fax: (201) 336-6069
Project Dir.: Melissa H. DeBartolo

Staff Attys.:
Kelly A. Durkin Harry J. Katz
Anthony Iannarelli

Mental Health, Social Security Disability, Family Law,
Landlord/Tenant and Other Entitlements

Northeast New Jersey Legal Services
Bergen County Division
190 Moore St., 1st Floor, Hackensack 07601
(201) 487-2166; Fax: (201) 487-3513
Email: nnjls@lsnj.org
Exec. Dir.: John H. Fitzgerald
Email: jfitzgerald@lsnj.org
Civil

LEGAL AID AND LEGAL SERVICES

BURLINGTON COUNTY

Community Health Law Project Mercer &
Burlington Counties
See Mercer County

South Jersey Legal Services, Inc.
107 High St., Mount Holly 08060
(609) 261-1088; Fax: (609) 267-7812

Managing Atty.: Maria Born, Ext. 6726
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CAMDEN COUNTY

Community Health Law Project
Atlantic, Camden, Cape May, Cumberland, Gloucester &
Salem Counties
Station House Office Bldg., Suite 400, 900 Haddon Ave.,
Collingswood 08108
(856) 858-9500; Fax: (856) 858-9545; TTY: (856) 858-9500
Email: collingswood@chlp.org

Managing Atty.: Brian G. Smith
Also serves counties of Atlantic, Cape May, Cumberland,
Gloucester, Salem

Civil legal services for indigent disabled.

South Jersey Legal Services, Inc.
Administrative Offices
745 Market St., 2nd Floor, Camden 08102
(856) 964-2010; Fax: (856) 964-0228; TDD: (856) 964-1204
Email: sjls.camden@lsnj.org

Exec. Dir.: Douglas E. Gershuny, Ext. 6209
Email: dgersuny@lsnj.org

Deputy Dir.: Ann M. Gorman, Ext. 6258
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Dir. of Pro Bono Service: Michelle T. Nuciglio, Ext. 6229
Email: mnuciglio@lsnj.org

Dir. of Litigation & Advocacy: Kenneth M. Goldman
Ext. 6330; Email: kgoldman@lsnj.org

*Family Public Entitlements, Community, Economic
Development, Elder Law, Housing, Community Legal
Education & Consumer Law*

Centralized Intake Unit
745 Market St., Camden 08102
(856) 964-9400; Fax: (856) 964-9415;
Client Intake: (800) 496-4570

Managing Atty.: Richard Chiumento, Ext. 6831
Email: rchiumento@lsnj.org

Staff Atty.: Lynda Yamamoto, Ext. 6216
Email: lyamamoto@lsnj.org

Camden County Neighborhood Office
745 Market St., Camden 08102
(856) 964-2010; Fax: (856) 338-9227

Managing Attys.:
Elliott Harris, Ext. 6208; Email: eharris@lsnj.org
Olga Pomar (Housing Preservation & Community
Development Coordinator), Ext. 6232
Email: opomar@lsnj.org

Senior Attys.:
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David Podell (Housing), Ext. 6274; Email: dpodell@lsnj.org

Staff Attys.:
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Alan Lesso, Ext. 6236; Email: alesso@lsnj.org
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Senior Citizens Advocate Center
745 Market St., Camden 08102-1117
(856) 964-2010; Fax: (856) 338-9227;
TDD: (856) 964-1204

Atty.: Thomas Wuersig, Ext. 6227
Email: twuersig@lsnj.org

CAPE MAY COUNTY

Community Health Law Project Atlantic, Camden,
Cape May, Cumberland, Gloucester & Salem Counties
See Camden County

South Jersey Legal Services, Inc.
1261 Route 9, P.O. Box 785, Cape May Court House 08210
(609) 465-3001; Fax: (609) 465-9018

Managing Atty.: Elizabeth Cunningham, Ext. 6613
Email: ecunningham@lsnj.org

Staff Attys.:
Michelle Altenpohl, Ext. 6619; Email: maltenpohl@lsnj.org
Carol Haig, Ext. 6617; Email: chaig@lsnj.org

Poverty Law

CUMBERLAND COUNTY

Community Health Law Project Atlantic, Camden,
Cape May, Cumberland, Gloucester & Salem Counties
See Camden County

South Jersey Legal Services, Inc.
415 W. Landis Ave., 2nd Floor, Vineland 08360
(856) 691-0494; Fax: (856) 691-5072

Managing Atty.: Ashley Courtney, Ext. 6437
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Senior Atty.: Brenda L. Rascher, Ext. 6427
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Charlotte Levins, Ext. 6477; Email: clevins@lsnj.org
Nessa Math, Ext. 6443; Email: nmath@lsnj.org
Lucas Nascimento, Ext. 6440; Email: lnascimento@lsnj.org
Also serves county of Salem

Workers' rights (Statewide)

ESSEX COUNTY

Essex County Legal Aid Association
Hall of Records, Room 118,
465 Dr. Martin Luther King Jr. Blvd., Newark 07102
(973) 622-0063; Fax: (973) 622-2699
Internet: www.eclaa.nj.org

Supervising Atty.: Ingrid Enriquez
Atty.: Gladys Moriarty
Client Services Specialist: Maria Roque
Business Admin.: Robert M. Adler (908) 672-0738
Civil: Landlord/Tenant, Family, Consumer

Essex-Newark Legal Services
5 Commerce St., 2nd Floor, Newark 07102
(973) 624-4500; Fax: (973) 624-8745
Email: enls@lsnj.org
Exec. Dir.: Felipe Chavana; Email: fchavana@lsnj.org
Deputy Dir.: Jose Ortiz
Managing Atty., Consumer Law: Carlton Lewis
Managing Atty., Elder Law: Rachael M. Baldeo
Managing Atty., Family Law: Diane R. Moxley
*Consumer Law, Education Law, Elder Law, Family Law,
Government Benefits, Health Law & Housing Law*

GLOUCESTER COUNTY

Community Health Law Project Atlantic, Camden,
Cape May, Cumberland, Gloucester & Salem Counties
See Camden County

South Jersey Legal Services, Inc.
47 Newton Ave., Woodbury 08096
(856) 848-5360; Fax: (856) 853-4259
Managing Atty.: Connie M. Sailey, Ext. 6825
Email: csaley@lsnj.org

Economic Stability and Entitlements Coordinator:
Lee Ginsburg, Ext. 6246; Email: lginsburg@lsnj.org

Staff Attys.:
Sandra Passaro, Ext. 6829; Email: spassaro@lsnj.org
Rebecca A. Preuss, Ext. 6830; Email: rpreuss@lsnj.org
Andrew Vazquez-Schroedinger, Ext. 6832
Email: avschroedinger@lsnj.org

Limited Civil Matters

LEGAL AID AND LEGAL SERVICES

HUDSON COUNTY

Community Health Law Project Union & Hudson
Counties
See Union County

Northeast New Jersey Legal Services
Hudson County Division

574 Summit Ave., Jersey City 07306
(201) 792-6363; Fax: (201) 798-8780
Email: mnjls@lsnj.org

Exec. Dir.: John H. Fitzgerald; Email: jfitzgerald@lsnj.org
Dir. of Litigation: Greg Diebold
Civil

HUNTERDON COUNTY

Legal Services of Northwest Jersey
Hunterdon County

82 Park Ave., Flemington 08822-1168
(908) 782-7979; Fax: (908) 782-9761; TDD: (866) 201-3672
Email: lsnwj-hunterdon@lsnj.org
Internet: www.lsnj.org/lsnwj

Managing Atty.: Alisa Grossman
Civil

MERCER COUNTY

Central Jersey Legal Services, Inc.
Mercer County Division

198 W. State St., Trenton 08608-1103
(609) 695-6249; Fax: (609) 392-7952
Internet: www.lsnj.org/cjls

Exec. Dir.: Janice Chapin; Email: jchapin@lsnj.org
Deputy Dir.: Susan J. Knispel; Email: sknispel@lsnj.org
Civil

Community Health Law Project
Mercer & Burlington Counties

225 E. State St., Suite 5, Trenton 08608
(609) 392-5553; Fax: (609) 392-5369; TTY: (609) 392-5369
Email: trenton@chlp.org
Managing Atty.: Stuart H. Weiner
Also serves county of Burlington

MIDDLESEX COUNTY

Central Jersey Legal Services Inc.
333 Middlesex County Division

317 George St., Suite 201, New Brunswick 08901-2006
(732) 249-7600; Fax: (732) 249-7966
Internet: www.lsnj.org/cjls

Director: Janice Chapin; Email: jchapin@lsnj.org

Middlesex County Division—Perth Amboy Office
313 State St., Room 308, Perth Amboy 08861-4117
(732) 324-1613; Fax: (732) 324-6253
Internet: www.lsnj.org/cjls

Managing Atty.: Russell Gale

Rutgers University

Office of Student Legal Services
Bishop House, 115 College Ave., New Brunswick 08901
(848) 932-4529

Internet: http://rusls.rutgers.edu

Director: Donald C. Heilman

Provides a wide range of services to Rutgers students

MONMOUTH COUNTY

Community Health Law Project
Monmouth & Ocean Counties

1 Main St., Suite 413, Eatontown 07724
(732) 380-1012; Fax: (732) 380-1015
Email: eatontown@chlp.org

Managing Atty.: Madeleine Coghlan
Also serves county of Ocean

Legal Aid Society of Monmouth County
2407 Rt. 66, P.O. Box 2006, Ocean 07712
(732) 869-5619

Director: Valerie Hemhauser

Civil Law

South Jersey Legal Services, Inc.
303 W. Main St., 1st Floor, Freehold 07728
(732) 414-6750; Fax: (732) 414-6757

Managing Atty.: Alicia Williams, Ext. 6513
Email: afwilliams@lsnj.org

Staff Attys.:

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Cadance Hulme, Ext. 6521; Email: chulme@lsnj.org

Michael Perez, Ext. 6511; Email: mperez@lsnj.org

Troy Torres, Ext. 6510; Email: ttorres@lsnj.org

Asst. Pro Bono Coordinator:

Kristine Carranceja-Gurski, Ext. 6516

Email: kgurski@lsnj.org

MORRIS COUNTY

Legal Aid Society of Morris County
See Legal Services of Northwest Jersey

Legal Services of Northwest Jersey
Morris County

30 Schuyler Pl., 2nd Floor, P.O. Box 900, Morristown 07963-0900
(973) 285-6911; Fax: (973) 605-8991
Email: lsnwj-morris@lsnwj.org

Internet: www.lsnj.org/lsnwj

Program Dir.: Gerald R. Brennan

Civil

OCEAN COUNTY

Community Health Law Project Monmouth & Ocean
Counties
See Monmouth County

South Jersey Legal Services, Inc.
215 Main St., Toms River 08753
(732) 608-7794; Fax: (732) 608-9636

Managing Atty.: Natasha McLaurin, Ext. 6565
Email: nmclaurin@lsnj.org

Staff Attys.:

Christopher Benson, Ext. 6560; Email: cbenson@lsnj.org

Olatokumbo Emmanuel, Ext. 6564; Email: oemmanuel@lsnj.org

Ashley Manto, Ext. 6567; Email: amanto@lsnj.org

Elnora Ocansey, Ext. 6562; Email: cocansey@lsnj.org

PASSAIC COUNTY

Community Health Law Project Essex & Passaic Counties
See Essex County

Northeast New Jersey Legal Services
Passaic County Division

152 Market St., 6th Floor, Paterson 07505
(973) 523-2900; Fax: (973) 523-9002
Email: nnjls@lsnj.org

Deputy Dir.: Leah Ashe

SALEM COUNTY

Community Health Law Project Atlantic, Camden,
Cape May, Cumberland, Gloucester & Salem Counties
See Camden County

South Jersey Legal Services, Inc.
See Cumberland County

LEGAL AID AND LEGAL SERVICES

SOMERSET COUNTY

Legal Services of Northwest Jersey
Somerset County
34 W. Main St., Suite 301, Somerville 08876
(908) 231-0840; Fax: (908) 231-6780; TDD: (866) 201-3672
Email: lsnwj-somerset@lsnj.org
Internet: www.lsnj.org/lsnwj

Exec. Dir.: Diane K. Smith; Email: lsnwj-admin@lsnj.org
Program Dir.: Carol V. Spicer 0 .0.

SUSSEX COUNTY

Legal Services of Northwest Jersey
Sussex County
18 Church St., Suite 120, Newton 07860-1702
(973) 383-7400; Fax: (973) 383-3469; TDD: (866) 201-3672
Email: lsnwj-sussex@lsnj.org
Internet: www.lsnj.org/lsnwj

Managing Atty.: Victoria Reiners

UNION COUNTY

Central Jersey Legal Services, Inc.
Union County Division
60 Prince St., Elizabeth 07208
(908) 354-4340; Fax: (908) 354-4361
Internet: www.lsnj.org/cjls
Deputy Dir.: Debbie Morgan; Email: dmorgan@lsnj.org
Civil

Community Health Law Project
Union & Hudson Counties
65 Jefferson Ave., Suite 402, Elizabeth 07201
(908) 355-8282; Fax: (908) 355-3724; TTY: (908) 355-3369
Email: elizabeth@chlp.org
Managing Atty.: Stacy M. Noonan
Also serves county of Hudson
Limited Civil legal services for low-income disabled and elderly (Union only)

WARREN COUNTY

Legal Services of Northwest Jersey
Warren County Division
91 Front St., Belvidere 07823-0065
(908) 475-2010; Fax: (908) 475-1719; TDD: (866) 201-3672
Email: lsnwj-warren@lsnj.org
Internet: www.lsnj.org/lsnwj
Managing Atty.: Grace E. Kelly

SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, P.C.
 By: Stuart A. Tucker, Esq., NJAID# 047561991
 A Professional Corporation
 Quakerbridge Executive Center
 101 Grovers Mill Road, Suite 200
 Lawrenceville, New Jersey 08648
 (609) 275-0400, Facsimile (609) 275-4511
 Attorneys for Plaintiff, Ronald Godbolt

RONALD GODBOLT,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION - MERCER COUNTY
Plaintiff,	:	
	:	DOCKET NO:
vs.	:	
	:	Civil Action
CARLOS L. SANTANA, UNITED	:	
STATES POSTAL SERVICE,	:	COMPLAINT AND JURY DEMAND
JOHN/JANE DOE 1-100, ABC	:	
CORPORATION 1-100, and XYZ	:	
PARTNERSHIP 1-100,	:	
representing one or more	:	
fictitious individuals or	:	
entities, individually,	:	
jointly, and severally,	:	
JOHN/JANE DOE 101-200, ABC	:	
CORPORATION 101-200, and XYZ	:	
PARTNERSHIP 101-200,	:	
representing one or more	:	
fictitious persons or	:	
entities consisting of	:	
Directors, Officers,	:	
Principals, Partners, Boards,	:	
Board Members or	:	
Representatives or Agents,	:	
individually, jointly, and	:	
severally,	:	
	:	
Defendants.	:	

Plaintiff, RONALD GODBOLT, residing at 430 Cleveland
 Avenue, in the City of Trenton, County of Mercer, and State of
 New Jersey 08629, by way of Complaint, states:

IDENTIFICATION OF THE PARTIES

1. Plaintiff, RONALD GODBOLT, reside at 430 Cleveland Avenue, in the City of Trenton, County of Mercer, and State of New Jersey 08629.

2. Defendant, CARLOS L. SANTANA, resides at 12 Vernetta Lane, in the Township of Medford, County of Burlington, and State of New Jersey 08055. Said Defendant is the driver of a motor vehicle that struck the vehicle operated by Plaintiff, RONALD GODBOLT. At the time of the accident, said Defendant was employed by Defendant, UNITED STATES POSTAL SERVICE, and was operating within the scope of his employment.

3. Defendant, UNITED STATES POSTAL SERVICE, is a government entity doing business at 20 South Montgomery Street, in the City of Trenton, County of Mercer, and State of New Jersey 08608. Said Defendant is the owner of a motor vehicle that struck the vehicle operated by Plaintiff, RONALD GODBOLT. At the time was the accident, said Defendant employed Defendant, CARLOS L. SANTAN.

FIRST COUNT - NEGLIGENCE

4. Plaintiff repeats the allegations contained in this complaint and makes same part of this count as if fully set forth herein.

5. On or about the 11th day of October, 2018, Plaintiff, RONALD GODBOLT, was the restrained driver of a motor vehicle

owned by him and lawfully proceeding north on Route 29 in the vicinity of its intersection with Lee Avenue in the City of Trenton, County of Mercer, and State of New Jersey.

6. At said time and place, Defendant, CARLOS L. SANTANA, residing at 12 Vernetta Lane, in the Township of Medford, County of Burlington, and State of New Jersey 08055, was operating a motor vehicle in the same area as Plaintiff, RONALD GODBOLT.

7. Said vehicle was operated, controlled, and possessed by Defendant, CARLOS L. SANTANA.

8. Defendant, CARLOS L. SANTANA, operated, controlled, maintained, caused to be placed, and serviced the vehicle in a negligent, careless, reckless, and wanton manner causing same to strike and collide with the motor vehicle operated by Plaintiff, RONALD GODBOLT.

9. The accident in question occurred as a direct and proximate result of the negligent activity of Defendant, CARLOS L. SANTANA.

10. Defendant, CARLOS L. SANTANA, operated said vehicle on said occasion in violation of N.J.S.A. 39:4-97 and other motor vehicle laws of the State of New Jersey.

11. As a direct and proximate result of the negligence of Defendant, CARLOS L. SANTANA, Plaintiff, RONALD GODBOLT, was caused to suffer and sustain severe, disabling, and permanent injuries, and has and will in the future be caused to obtain

medical treatment, and has been and will in the future be caused to refrain from his normal pursuits.

WHEREFORE, Plaintiff, RONALD GODBOLT, demands judgment against Defendant, CARLOS L. SANTANA, for:

- A. General damages;
- B. Compensatory damages;
- C. Cost and interest;
- D. Attorney's fees;
- E. Any other relief the Court deems just and equitable.

SECOND COUNT - NEGLIGENT ENTRUSTMENT AND MAINTENANCE

12. Plaintiff repeats the allegations contained in this complaint and makes same part of this count as if fully set forth herein.

13. Defendant, UNITED STATES POSTAL SERVICE, as the registered owner of the motor vehicle operated by Defendant, CARLOS L. SANTANA, at the time of the subject accident, gave permission and approval to said Defendant to operate said vehicle.

14. At the time Defendant, UNITED STATES POSTAL SERVICE, gave this permission and approval to Defendant, CARLOS L. SANTANA, Defendant, UNITED STATES POSTAL SERVICE, knew or should have known that Defendant, CARLOS L. SANTANA, was a negligent, careless, reckless, and/or willful and wanton driver.

15. Defendant, UNITED STATES POSTAL SERVICE, controlled, maintained, and entrusted the motor vehicle in a negligent, careless, reckless, and wanton manner causing same to collide with Plaintiff.

16. As a direct and proximate result of Defendant, UNITED STATES POSTAL SERVICE's negligent entrustment of its vehicle to Defendant, CARLOS L. SANTANA, Plaintiff, RONALD GODBOLT, was caused to suffer and sustain severe, disabling, and permanent injuries, and has and will in the future be caused to obtain medical treatment, and has been and will in the future be caused to refrain from his normal pursuits.

WHEREFORE, Plaintiff, RONALD GODBOLT, demands judgment against Defendant, UNITED STATES POSTAL SERVICE, for:

- A. General damages;
- B. Compensatory damages;
- C. Cost and interest;
- D. Attorney's fees;
- E. Any other relief the Court deems just and equitable.

THIRD COUNT - AGENCY (*RESPONDEAT SUPERIOR*)

17. Plaintiff repeats the allegations contained in this complaint and makes same part of this count as if fully set forth herein.

18. Defendant, UNITED STATES POSTAL SERVICE, authorized and/or gave permission and approval to Defendant, CARLOS L.

SANTANA, as its agent, servant, and/or employee acting on its behalf, to operate its vehicle for purposes of conducting its business.

19. Defendant, UNITED STATES POSTAL SERVICE, is vicariously liable and liable under the theory of *respondeat superior* for the actions of Defendant, CARLOS L. SANTANA, while he was operating the vehicle it owned and/or permitted to be used to conduct its business in a negligent, careless, reckless, and/or wanton manner thereby causing the subject accident.

20. As a direct and proximate result of the negligence, carelessness, recklessness, and/or wanton conduct of Defendants, UNITED STATES POSTAL SERVICE and CARLOS L. SANTANA, Plaintiff, RONALD GODBOLT, was caused to suffer and sustain severe, disabling and permanent injuries, has and will in the future be caused to obtain medical treatment and has been and will in the future be caused to refrain from his normal pursuits.

WHEREFORE, Plaintiff, RONALD GODBOLT, demands judgment against Defendant, UNITED STATES POSTAL SERVICE, for:

- A. General damages;
- B. Compensatory damages;
- C. Cost and interest;
- D. Attorney's fees;
- E. Any other relief the Court deems just and equitable.

FOURTH COUNT - NEGLIGENCE (Fictitious Defendants)

21. Plaintiff repeats the allegations contained in this complaint and makes same part of this count as if fully set forth herein.

22. At all times hereinafter mentioned, Defendant, JOHN/JANE DOE 1-100, ABC CORPORATION 1-100, XYZ PARTNERSHIP 1-100, representing one or more fictitious individuals or entities, individually, jointly, and severally, JOHN/JANE DOE 101-200, ABC CORPORATION 101-200, and XYZ PARTNERSHIP 101-200, representing one or more fictitious persons or entities consisting of Directors, Officers, Principals, Partners, Boards, Board Members or Representatives or Agents, individually, jointly, and severally, caused to be operated, controlled, maintained, and/or serviced a vehicle in a careless, reckless, intentional, and wanton manner which caused the motor vehicle accident which is the subject of this lawsuit.

23. At all times hereinafter mentioned, Defendant, JOHN/JANE DOE 1-100, ABC CORPORATION 1-100, and XYZ PARTNERSHIP 1-100, representing one or more fictitious individuals or entities, individually, jointly, and severally, was acting as an agent, servant, and/or employee of Defendants, JOHN/JANE DOE 101-200, ABC CORPORATION 101-200, and XYZ PARTNERSHIP 101-200, representing one or more fictitious persons or entities consisting of Directors, Officers, Principals, Partners, Boards,

Board Members or Representatives or Agents, individually, jointly, and severally.

24. At all times hereinafter mentioned, Defendant, JOHN/JANE DOE 101-200, ABC CORPORATION 101-200, and XYZ PARTNERSHIP 101-200, representing one or more fictitious persons or entities consisting of Directors, Officers, Principals, Partners, Boards, Board Members or Representatives or Agents, individually, jointly, and severally, negligently entrusted the motor vehicle to JOHN/JANE DOE 1-100, ABC CORPORATION 1-100, and XYZ PARTNERSHIP 1-100, representing one or more fictitious individuals or entities, individually, jointly, and severally.

25. As a result of the negligence, recklessness, carelessness, wanton, and intentional operation, control, and use of the vehicle of the Defendant, JOHN/JANE DOE 1-100, ABC CORPORATION 1-100, XYZ PARTNERSHIP 1-100, representing one or more fictitious individuals or entities, individually, jointly, and severally, JOHN/JANE DOE 101-200, ABC CORPORATION 101-200, and XYZ PARTNERSHIP 101-200, representing one or more fictitious persons or entities consisting of Directors, Officers, Principals, Partners, Boards, Board Members or Representatives or Agents, individually, jointly, and severally, Plaintiff, RONALD GODBOLT, was caused to suffer and sustain severe, disabling, and permanent injuries, and has and will in the future be caused to obtain medical treatment, and has been and

will in the future be caused to refrain from his normal pursuits.

WHEREFORE, Plaintiff, RONALD GODBOLT, demands judgment against Defendant, JOHN/JANE DOE 1-100, ABC CORPORATION 1-100, XYZ PARTNERSHIP 1-100, representing one or more fictitious individuals or entities, individually, jointly, and severally, JOHN/JANE DOE 101-200, ABC CORPORATION 101-200, and XYZ PARTNERSHIP 101-200, representing one or more fictitious persons or entities consisting of Directors, Officers, Principals, Partners, Boards, Board Members or Representatives or Agents, individually, jointly, and severally, for:

- A. General damages;
- B. Compensatory damages;
- C. Cost and interest;
- D. Attorney's fees;
- E. Any other relief the Court deems just and equitable.

CERTIFICATION

PLEASE TAKE NOTICE pursuant to the provisions of R.4:5-1, the undersigned attorney certifies that this matter is not the subject of any other action pending in any court or arbitration proceeding, nor is any other action or arbitration proceeding contemplated, and all known necessary parties have been joined in this action.

NOTICE PURSUANT TO RULES 1:5-1(a) AND 4:17-4(c)

PLEASE TAKE NOTICE that the undersigned attorney, counsel for Plaintiff, hereby demands pursuant to R. 1:5-1(a) and R. 4:17-4(c), that each party herein serving pleadings and interrogatories and receiving answers thereto, serve copies of all such pleadings and answered interrogatories received from any party, including any documents, papers and other materials referred to therein, upon the undersigned attorney, and take notice that this is a continuing demand.

DEMAND FOR ANSWERS TO INTERROGATORIES

PLEASE TAKE NOTICE pursuant to R.4:17-1(b), Plaintiff hereby demands that Defendants provide answers to the uniform Interrogatories set forth in Form C and Form C(1) of Appendix II of the Rules Governing the Courts of the State of New Jersey.

DEMAND FOR ANSWERS TO SUPPLEMENTAL INTERROGATORIES

PLEASE TAKE NOTICE pursuant to R.4:17, Plaintiff hereby demands that the Defendants provide answers to the Supplemental Interrogatories attached herein.

DEMAND TO ANSWER NOTICE TO PRODUCE

PLEASE TAKE NOTICE pursuant to R.4:18-1, Plaintiff hereby requests that the Defendants respond to the Notice to Produce attached herein within the time prescribed by the Court Rules.

REQUEST FOR DISCOVERY OF INSURANCE

PLEASE TAKE NOTICE pursuant to R.4:10-2(b) demand is hereby made that Defendants respond to the Request for Discovery of Insurance attached herein.

**CERTIFICATION PURSUANT TO AUTOMOBILE INSURANCE COSTS
REDUCTION ACT OF 1998**

PLEASE TAKE NOTICE this action is filed pursuant to the requirements of the Automobile Insurance Costs Reduction Act of 1998.

DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that attorney, Stuart A. Tucker, Esquire, is hereby designated as trial counsel in the above captioned litigation for the firm of SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, P.C.

JURY DEMAND

PLEASE TAKE NOTICE that Plaintiff hereby demands a trial by jury as to all issues so triable.

NOTICE PURSUANT TO R.1:7-1(b)

PLEASE TAKE NOTICE Plaintiff intends to utilize the time-unit basis for calculating unliquidated damages in Plaintiff's closing statement to the jury and the Court.

**NOTICE OF DISCOVERY DEPOSITIONS SUBJECT TO AUDIOVISUAL RECORDING
PURSUANT TO R.4:14-1, ET SEQ.**

PLEASE TAKE NOTICE that in accordance with the Rules Governing the Courts of the State of New Jersey, Pursuant to

R.4:14-1, et seq., each discovery deposition conducted shall be subject to audiovisual recording pursuant to R.4:14-9. This notice is being served in accordance with R.4:14-2(a) and R.4-14-9(b).

**SZAFERMAN, LAKIND, BLUMSTEIN
& BLADER, P.C.**

Attorneys for Plaintiff

By: /s/ Stuart A. Tucker
Stuart A. Tucker, Esquire

Dated: September 22, 2020

SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, P.C.
 By: Stuart A. Tucker, Esq., NJAID# 047561991
 A Professional Corporation
 Quakerbridge Executive Center
 101 Grovers Mill Road, Suite 200
 Lawrenceville, New Jersey 08648
 (609) 275-0400, Facsimile (609) 275-4511
 Attorneys for Plaintiff, Ronald Godbolt

RONALD GODBOLT,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION - MERCER COUNTY
Plaintiff,	:	
	:	DOCKET NO:
vs.	:	
	:	Civil Action
CARLOS L. SANTANA, UNITED	:	
STATES POSTAL SERVICE,	:	PLAINTIFF'S DEMAND FOR
JOHN/JANE DOE 1-100, ABC	:	UNIFORM AND SUPPLEMENTAL
CORPORATION 1-100, and XYZ	:	INTERROGATORIES
PARTNERSHIP 1-100,	:	
representing one or more	:	
fictitious individuals or	:	
entities, individually,	:	
jointly, and severally,	:	
JOHN/JANE DOE 101-200, ABC	:	
CORPORATION 101-200, and XYZ	:	
PARTNERSHIP 101-200,	:	
representing one or more	:	
fictitious persons or	:	
entities consisting of	:	
Directors, Officers,	:	
Principals, Partners, Boards,	:	
Board Members or	:	
Representatives or Agents,	:	
individually, jointly, and	:	
severally,	:	
	:	
Defendants.	:	

Pursuant to R. 4:17-1(b)(ii), Plaintiff hereby demands that each Defendant provide answers to the Uniform Interrogatories set forth in Form C and Form C(1) of Appendix II, and Supplemental Interrogatories attached hereto.

Pursuant to R. 4:17-4(b), each Defendant shall serve answers upon Plaintiff within 60 days from the date that this Demand was served.

**SZAFERMAN, LAKIND, BLUMSTEIN
& BLADER, P.C.**
Attorneys for Plaintiff

By: /s/ Stuart A. Tucker
Stuart A. Tucker, Esquire

Dated: September 22, 2020

SUPPLEMENTAL INTERROGATORIES

1. Provide comprehensive details of any prior or subsequent motor vehicle accidents or lawsuits in which you have been involved, including, without limitation, the facts of the incident, any injuries alleged, the parties involved, and, if litigated, the name of the suit, the venue, and Court docket number.

RESPONSE:

2. Please state in detail your itinerary on the date of the auto accident, including each place at which you were present, your length of stay at each such place, and a detailed account of whom you saw and what you did at each such place.

RESPONSE:

3. If you contend that the personal injuries of Plaintiff were not caused by the collision with your vehicle, state with particularity the facts upon which you base your contention.

RESPONSE:

4. Please identify all persons to whom you have given signed statements regarding the auto accident, the date thereof, and the name of the person in whose custody each is at this time.

RESPONSE:

5. If you contend that Plaintiff acted in such a manner as to cause or contribute to the personal injuries, state all facts upon which you rely to demonstrate this.

RESPONSE:

6. Please state whether you consumed any drugs, medicines, or alcoholic beverages within twenty-four (24) hours prior to said occurrence, the place where such drugs, medicines, or alcoholic beverages were obtained, the nature of the drugs, medicines, or alcoholic beverages, and the amount thereof.

RESPONSE:

7. Please state whether you were under the care of a physician at the time of the auto accident. If so, please state the name and address of your physician, specify the illness or condition for which you were treated, and list any prescribed medication.

RESPONSE:

8. Please state in detail all actions you took or attempted to take to avoid the auto accident.

RESPONSE:

9. Please state whether your driver's license has ever been suspended and state the date of suspension(s), reason for the suspension, and the name and address of the court that issued the suspension.

RESPONSE:

10. Please state whether you were issued any motor vehicle summonses in connection with the accident and state: the court, summons number, disposition, and whether it was with or without civil reservation.

RESPONSE:

CERTIFICATION

I hereby certify that the copies of the reports annexed hereto provided by either treating physicians or proposed expert witnesses are the exact copies of the entire report or reports provided by them; that the existence of other reports of said doctors or experts, either written or oral, are unknown to me, and if such become later known or available, I shall serve them promptly on the propounding party.

I certify that the foregoing statements made by me are true. I am aware that if the foregoing statements made by me are willfully false, I am subject to punishment.

By: _____
CARLOS L. SANTANA

Dated: _____

CERTIFICATION

I hereby certify that the copies of the reports annexed hereto provided by either treating physicians or proposed expert witnesses are the exact copies of the entire report or reports provided by them; that the existence of other reports of said doctors or experts, either written or oral, are unknown to me, and if such become later known or available, I shall serve them promptly on the propounding party.

I certify that the foregoing statements made by me are true. I am aware that if the foregoing statements made by me are willfully false, I am subject to punishment.

By: _____
UNITED STATES POSTAL
SERVICE

Dated: _____

SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, P.C.
 By: Stuart A. Tucker, Esq., NJAID# 047561991
 A Professional Corporation
 Quakerbridge Executive Center
 101 Grovers Mill Road, Suite 200
 Lawrenceville, New Jersey 08648
 (609) 275-0400, Facsimile (609) 275-4511
 Attorneys for Plaintiff, Ronald Godbolt

RONALD GODBOLT,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION - MERCER COUNTY
Plaintiff,	:	
	:	DOCKET NO:
vs.	:	
	:	Civil Action
CARLOS L. SANTANA, UNITED	:	
STATES POSTAL SERVICE,	:	PLAINTIFF'S DEMAND FOR
JOHN/JANE DOE 1-100, ABC	:	NOTICE TO PRODUCE
CORPORATION 1-100, and XYZ	:	
PARTNERSHIP 1-100,	:	
representing one or more	:	
fictitious individuals or	:	
entities, individually,	:	
jointly, and severally,	:	
JOHN/JANE DOE 101-200, ABC	:	
CORPORATION 101-200, and XYZ	:	
PARTNERSHIP 101-200,	:	
representing one or more	:	
fictitious persons or	:	
entities consisting of	:	
Directors, Officers,	:	
Principals, Partners, Boards,	:	
Board Members or	:	
Representatives or Agents,	:	
individually, jointly, and	:	
severally,	:	
	:	
Defendants.	:	

INSTRUCTIONS FOR USE

1. In producing the documents designated below, you are requested to furnish all documents known or available to you regardless of whether a document is currently in your possession, custody or control, or that of your attorneys,

employees, agents, investigators or other representatives, or is otherwise available to you.

2. If for any reason, you are unable to produce in full any document requested:

- a. Produce each such document to the fullest extent possible;
- b. Specify the reasons for your inability to produce the remainder; and
- c. State in detail whatever information, knowledge or belief you have concerning the whereabouts and substance of each document not produced in full.

3. If any document requested was at one time in existence, but is no longer in existence, please state for each document as to which that is the case:

- a. The type of document;
- b. The types of information contained therein;
- c. The date upon which it cease to exist;
- d. The circumstances under which it ceased to exist;
- e. The identity of all persons having knowledge of the circumstances under which it ceased to exist; and
- f. The identity of all persons who have knowledge or who had knowledge of the contents thereof.

4. For each document requested which you are unable to produce and which was at any time within your possession, custody or control, or to which you had access at any time, specify in detail:

- a. The nature of the document, e.g., letter, memorandum, etc.;
- b. The author of the document;
- c. All recipients of the document;
- d. A summary of the information contained in the document;

- e. The date on which you lost, relinquished or otherwise ceased to have possession, custody or control of, or access to the document;
- f. Identify all persons having knowledge of the circumstances whereby you lost, relinquished or otherwise ceased to have possession, custody or control of, or access to, the document;
- g. Identify all persons who have or have had knowledge of the contents of the document, in full or in part.

5. In the event you seek to withhold or do withhold any document, in whole or in part, on the basis that it is not subject to discovery, produce a list of all such documents, and as to each document state:

- a. The name of each author, writer, sender or initiator of each such document;
- b. The name of each recipient, addressee or party to whom such document was sent or intended to be sent;
- c. The name of each and every person who received a copy of the document;
- d. The date of the document, or if no date appears on the document, the date the document was prepared;
- e. The title of the document, or if it has no title, then such other description of the document and its subject matter as shall be sufficient to identify the document; and
- f. The grounds claimed for withholding the document from discovery, e.g., attorney -client privilege, and the factual basis for the claim.

6. As to each document produced, you are requested to designate the paragraph and subparagraph of this request which each such document is responsive.

7. This request is a continuing one, and requires that you produce all responsive documents and tangible objects whenever you obtain or become aware of them, even if they are not in your possession or available to you on the date you first produce documents pursuant to this request.

DEFINITIONS

1. "Defendant(s)," "you" or "yours" means the Defendant(s) in the above-captioned matter, and the past and present employees, representatives, agents or attorneys of the Defendant(s).

2. "Any," "each" and "all" shall be read to be all inclusive, and to require the production of each and every document (as hereinafter defined) responsive to the particular request for production in which such term appears.

3. "And" and "or" and any other conjunctions or disjunction used herein shall be read both conjunctively and disjunctively so as to require the production of all documents (as hereinafter described) responsive to all or any part of each particular request for production in which any conjunction or disjunction appears.

4. "Person" means an individual, firm, corporation, association, organization, partnership, proprietorship, corporation, L.L.C., or any other legal entity.

5. The term "document" includes all electronic media or other tangible forms in which information is stored and includes all written or graphic matter of every kind and description, however produced or reproduced, WHETHER DRAFT OR FINAL, original or reproduction, including, but not limited to correspondence, memoranda, notes, films, videos, transcripts, contracts, agreements, licenses, memoranda of telephone conversations or personal conversations, microfilm, magnetic cassette tapes, computer diskettes, telegrams, books, newspaper articles,

magazines, advertisements, periodicals, bulletins, circulars, pamphlets, statements, notices, reports, rules, regulations, directives, orders, teletype messages, e-mail messages, minutes of meetings, interoffice communications, financial statements, ledgers, books of account, proposals, prospectuses, offers, purchase orders, receipts, working papers, desk calendars, computer calendars, appointment books, diaries, time sheets, logs, movies, tapes for visual or audio reproduction, recordings or materials similar to any of the foregoing, however denominated, and including writings, drawings, graphs, charts, photographs, data processing results, printouts, and computations (both in existence and stored in memory components), and other compilations from which information can be obtained or translated, if necessary, through detection devices into reasonably usable form. THE TERM "DOCUMENT" INCLUDES ALL COPIES OF A DOCUMENT WHICH CONTAIN ANY ADDITIONAL WRITING, UNDERLINING, NOTES, DELETIONS OR ANY OTHER MARKINGS OR NOTATIONS, OR ARE OTHERWISE NOT IDENTICAL COPIES OF THE ORIGINAL.

6. The term "video" as used herein refers to any visual or audiovisual recording however stored. Where a video is responsive to one of the following requests, you are requested to produce said video in the format in which it is kept in the ordinary course of business. If this is not possible, you are requested to produce the recording in a reasonably usable format.

DOCUMENTS TO BE PRODUCED

1. Any documents referred to, or alleged to give rise to any claim in the complaint.

2. Any documents identified in, or relied upon by Defendant(s) in answering discovery requests of any party.

3. All written or recorded statements from any party or witness related to the case.

4. Any document containing an admission on the part of any party.

5. All photographs related to any issue in the case.

6. All video recordings however stored related to any issue in the case.

7. All computer disks and/or data or files containing digital images related to any issue in the case.

8. All police reports related to the case.

9. All investigative reports related to the case.

10. All notes, documents, or diaries generated by Defendant(s) which arose from or are related to the case.

11. All notes, drawings, sketches, plats, diagrams or blueprints related to any issue in the case.

12. Any document, handbook, manual or treatise setting forth any duty, standard or principle related to any issue in the case.

13. Any motor vehicle summons issued to any party.

14. Any insurance policy providing coverage to Defendant(s) for any issue in the case.

15. Any document or form submitted to any insurance company as a result of the incident giving rise to the case.

16. Any newspaper or magazine article related to or about any issue in the case.

17. Any document or form submitted to, or received from, any person or entity for the purpose of obtaining payment or coverage for any property loss related to the case.

18. If you allege any of the injuries Plaintiff contends were caused by the incident in issue were not caused by incident/accident, please produce the following documents:

- a. all medical reports and documents upon which you rely;
- b. copies of any and all pleadings, interrogatories, deposition or trial transcripts, or any other records upon which you will rely.

19. If you allege the Plaintiff has been involved in any previous or subsequent accidents or incidents or sustained any previous or subsequent injuries to those in question, please produce the following:

- a. copies of all medical reports and documents upon which you will rely;
- b. copies of any and all pleadings, interrogatories, deposition or trial transcripts, or any other records upon which you will rely.

20. If you intend to utilize a seat belt defense, please produce a copy of your expert's report including but not limited to all raw data, all calculations, all computer programs, all engineering studies, said expert's curriculum vitae, any and all standards, and all treaties upon which said expert will rely.

21. If you intend to rely upon any journals, and/or medical or scientific treatises, produce the following:

- a. If you intend to cross-examine any of the Plaintiff's experts by use of any medical or scientific treatises, or any treatises please attach copies of said documents.
- b. If any of your expert witnesses intend to rely upon any medical or scientific treatises or any treatises or any publications and/or periodicals during direct or re-direct testimony, please attach copies of said documents.

22. If you allege the Plaintiff made any written admissions or declarations against interest as to the happening

of the accident or the injuries sustained in the accident, please produce copies of any documents containing such admissions or declarations against interest.

23. If you allege that any of the Plaintiff's medical treatment was unnecessary, unreasonable or not related to the accident/incident forming the basis of this complaint, please attach copies of all documentation upon which you will rely to support these allegations.

24. If Plaintiff is asserting a lost wage claim or loss of income and you allege that the Plaintiff was not disabled for any of the period of time claimed, please attach copies of any documentation upon which your allegation is based.

25. If you allege that Plaintiff had any pre-existing medical condition, please attached copies of any medical records, reports and/or bills or any other documentation upon which you intend to rely to support this allegation.

26. Please attach copies of all defense medical examinations.

27. Please attach copies of any medical examinations performed at the request of any person or entity not a party to this matter.

28. Please attach copies of all written witness statements.

29. Please produce copies of any and all statements taken from any of your employees as a result of this accident.

30. Please produce copies of all statements taken by you, or anyone acting on your behalf or by any party to this action regarding the happening of this accident.

31. Please attach copies of any reports made to anyone concerning the incident which is the subject matter of this suit.

32. If you allege that this accident was caused in part or in whole by any mechanical failure or defect of any of the vehicles involved in the accident please attach copies of all documents supporting said allegation.

33. Provide a copy of all medical files, hospital records, doctor, chiropractor, physical therapist, treatment notes, records or documents related to Plaintiff's injuries in this case.

34. Provide a copy of all diagnostic test results, such as x-rays, CAT scans, EMG's and MRI's related to Plaintiff's injuries in the case.

35. Provide a copy of all legal files related to other personal injury litigation in which Defendant has been involved in the past ten (10) years either as a Plaintiff or a Defendant, including all pleadings, discovery responses and deposition transcripts of Defendant or any of his/her medical experts.

36. Provide a copy of all letters or documents used to retain or correspond with any expert in the case.

37. Provide a copy of all documents provided to any expert in the case.

38. Provide a copy of all documents received from any expert in the case.

39. Provide a copy of all reports received from any expert in the case.

40. Provide a professional resume or curriculum vitae for all experts in the case.

41. Provide a copy of all texts, treatises, professional articles or other authoritative material which was relied upon by any expert in formulating an opinion about any issue in the case.

42. Provide a copy of all photographs, videos or digital images taken by any expert or their staff in relation to the case.

43. Provide a copy of all deposition transcripts from other legal proceedings of any party or witness in this case.

44. Provide a copy of any expert report from other legal proceedings of any expert witness in this case.

45. Provide a copy of all documents related to any arrest or conviction of any party or witness in this case.

46. Provide a copy of any and all documents which may or will be issued as an exhibit at trial, arbitration, deposition or evidentiary hearing in this matter.

47. The full name, current address, phone number, and statements, whether written, recorded, or otherwise, of any and all witnesses to this case including any person who may be called to testify on your behalf.

48. Copies of any and all documents secured by you regarding this case, whether secured via subpoena, authorization, or otherwise specifically including all fruits of your subpoenas. Accept this and all requests as a continuing request throughout this litigation.

49. A true copy of the declaration sheet and the actual policy of insurance in effect for your automobile on the day of this incident.

50. Defendant shall provide Plaintiff the following in regards to any surveillance and/or video and/or images taken in investigation of Plaintiff:

- a. Any and all logs that were kept concerning the filming of the video and/or images;
- b. A list of all teams, team members and other personnel involved in the surveillance and/or filming of the video and/or images along with the

- times those individuals were involved in the videoing/video capturing or editing and the location of those individuals at the time of the videoing/video capturing or editing and what those individuals were instructed to observe;
- c. A list of all people involved in the editing of the video and/or images along with the times they worked on said video and/or images and a detailed description of what they edited to include:
 - i) Portions of original video, images or data removed;
 - ii) Voice-overs
 - iii) Portions of the video, images or data clarified;
 - iv) Any other editing job performed by these individuals.
 - d. A list of all people speaking on the video and/or images and what times those people were present for filming or recording or editing;
 - e. A description of what is contained on the videos, disks, videotapes, electronic media or data, and/or other stored images;
 - f. An explanation of what is contained in the videos, disks, videotapes, and/or other stored images;
 - g. A detailed explanation of what the Defendant claims is shown by the videos, disks, videotapes, electronic media or data, and/or other stored images.
 - h. A labeled set of video and/or images files with each video and/or image file named according to its contents.

- i. A list of all people associated with the surveillance, filming, capturing, recording, editing, production, viewing, delivery, and otherwise involved in any manner with the videos, disks, videotapes, and/or other stored images recorded and when each person was involved with said recordings and what they did with or to said recordings.
- j. A list of all the equipment used in the filming or recording of the video and/or images including the model numbers of such equipment.
- k. All invoices, billing, charges and receipts regarding the payment and billing for any and all surveillance effort including but not limited to invoices, canceled drafts, proof of payment, bills, fee schedules, reimbursements for mileage, expenses, and equipment.
- l. Unedited/un-redacted copies of the original videos, disks, videotapes, media, data, and/or other stored images, video, and surveillance logs.

**SZAFERMAN, LAKIND, BLUMSTEIN
& BLADER, P.C.**

Attorneys for Plaintiff

By: /s/ Stuart A. Tucker
Stuart A. Tucker, Esquire

Dated: September 22, 2020

SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, P.C.
 By: Stuart A. Tucker, Esq., NJAID# 047561991
 A Professional Corporation
 Quakerbridge Executive Center
 101 Grovers Mill Road, Suite 200
 Lawrenceville, New Jersey 08648
 (609) 275-0400, Facsimile (609) 275-4511
 Attorneys for Plaintiff, Ronald Godbolt

RONALD GODBOLT,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION - MERCER COUNTY
Plaintiff,	:	
	:	DOCKET NO:
vs.	:	
	:	Civil Action
CARLOS L. SANTANA, UNITED	:	
STATES POSTAL SERVICE,	:	PLAINTIFF'S DEMAND FOR
JOHN/JANE DOE 1-100, ABC	:	DISCOVERY OF INSURANCE
CORPORATION 1-100, and XYZ	:	
PARTNERSHIP 1-100,	:	
representing one or more	:	
fictitious individuals or	:	
entities, individually,	:	
jointly, and severally,	:	
JOHN/JANE DOE 101-200, ABC	:	
CORPORATION 101-200, and XYZ	:	
PARTNERSHIP 101-200,	:	
representing one or more	:	
fictitious persons or	:	
entities consisting of	:	
Directors, Officers,	:	
Principals, Partners, Boards,	:	
Board Members or	:	
Representatives or Agents,	:	
individually, jointly, and	:	
severally,	:	
Defendants.	:	

Demand is hereby made that you disclose to the undersigned whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.

YES () NO ().

If the answer is "yes" attach a copy of each or in the alternative state, under oath or certification (a) number (b) name and address of insurer or issuer (c) inception and expiration dates (d) names and addresses of all persons insured thereunder (e) personal injury limits (f) property damage limits (g) medical payment limits (h) name and address of person who has custody and possession thereof (i) where and when each policy or agreement can be inspected and copied.

**SZAFERMAN, LAKIND, BLUMSTEIN
& BLADER, P.C.**

Attorneys for Plaintiff

By: /s/ Stuart A. Tucker
Stuart A. Tucker, Esquire

Dated: September 22, 2020

Civil Case Information Statement

Case Details: MERCER | Civil Part Docket# L-001675-20

Case Caption: GODBOLT RONALD VS SANTANA
CARLOS

Case Initiation Date: 09/22/2020

Attorney Name: STUART A TUCKER

Firm Name: SZAFERMAN LAKIND BLUMSTEIN & BLADER
PC

Address: 101 GROVERS MILL RD SUITE 200
LAWRENCEVILLE NJ 08648

Phone: 6092750400

Name of Party: PLAINTIFF : GODBOLT, RONALD

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (VERBAL
THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Are sexual abuse claims alleged by: RONALD GODBOLT? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO
If yes, please identify the requested accommodation:

Will an interpreter be needed? NO
If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

09/22/2020
Dated

/s/ STUART A TUCKER
Signed

